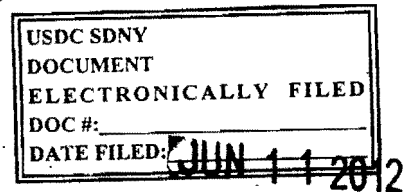


JEREMY D. ZIELINSKI  
P.O. Box 231  
Hagaman, NY 12086

**BY FACSIMILE**

Hon. J. Paul Oetken  
United States District Judge  
U.S. District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007



Re: Zielinski v. DeFreest, et al.  
12-CV-1160 (JPO)

**MEMO ENDORSED**  
June 8, 2012

Dear Judge Oetken:

I write to respectfully request a short extension of time to file a response to the defendants' motion to dismiss (Dkt. No. 16), including service of an amended complaint.

I am a full-time student, and the motion to dismiss was mailed to me during college finals week, so I did not have a chance to review it until the end of the week. The defendants' arguments are not simple and involve constitutional issues that may be first impression (such as whether it violates the First Amendment for probation officers to extra-judicially impose a content-based prior restraint under the guise of a condition requiring their "instructions" to be followed by probationers). I have also been in a family court trial; have an appeal in the 2nd Circuit due June 15th; have a separate civil rights matter in another court; and have been involved in investigations and settlement negotiations challenging violations of NY Correction Law Art. 23-A.<sup>1</sup> The week of June 4-8 is the week of my summer class mid-terms; and all of my summer classes have twice the workload of classes in other semesters because what normally takes twelve weeks is done in only six. I am employed full-time in a night shift position. Finally, to get between school, work and home I commute almost 3 hours per day six days per week. Accordingly, despite my best efforts (including going more than 24 hours without sleep more than once), I have simply not had time to finish the papers opposing the defendants' motion.

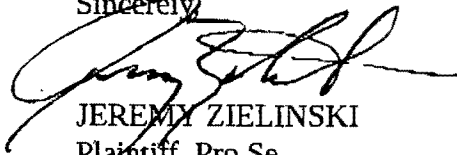
I would therefore ask that I be given until June 22, 2012 to file a cross-motion to amend and opposition to the defendants' motion to dismiss. I do not anticipate a need for further extension to make my response. I have been unable to reach the defendants' attorney, but they were given two extensions to respond to the original complaint and I have not requested any extensions to respond to their motion. It is respectfully submitted that this extension would not prejudice the defendants.

<sup>1</sup> NY Corr. L. Art. 23-A prohibits discriminatory conviction record-based employment denials. I have brought several successful cases challenging this type of discrimination before the State Division of Human Rights in recent months.

COPIES MAILED TO  
PRO SE PARTY ON JUN 11 2012

Thank you in advance for your consideration of this request.

Sincerely,



JEREMY ZIELINSKI  
Plaintiff, Pro Se

cc: Ellen Blain  
Assistant U.S. Attorney  
Attorney for Defendants  
86 Chambers Street, 3rd Floor  
New York, NY 10007

*Application granted.  
Plaintiff's request for  
leave to file an amended  
complaint is also granted.*

**SO ORDERED:**



J. PAUL OETKEN  
U.S.D.J.

6-11-12